

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Cr. No. 14-00248 (PKC)

vs.

**MOTION FOR MODIFICATION
OF BOND**

MICHAEL GRIMM,

Defendant.

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MOTION FOR MODIFICATION OF BOND

Defendant Michael Grimm, by and through his undersigned counsel, respectfully moves this Court for a modification of his bond.

Under his current bond, Mr. Grimm's travel is limited to the continental United States. Mr. Grimm is pursuing an employment opportunity with a company doing business abroad which would require him to travel to Europe for approximately one week in the spring of 2015. He will be unable to meet the responsibilities of this potential employment if his bond is not modified to allow travel during that one week period.

Undersigned counsel has contacted Pretrial Services, which takes no position on this motion while acknowledging that Mr. Grimm has complied with all of the terms of his bond. The Government has indicated that it opposes this motion.

If this modification is approved, in advance of his date of departure, Mr. Grimm will provide to Pretrial Services and the Government a detailed itinerary of his travel as well any other information requested relating to his travel arrangements.

Dated: Miami, Florida
March 4, 2015

By: /s Daniel Lawrence Rashbaum
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Counsel for Michael Grimm

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 4, 2015, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive Notices of Electronic Filing electronically.

/s/ Daniel Lawrence Rashbaum
Daniel Lawrence Rashbaum